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EMMANUEL GOLDSTEIN

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNIVERSAL CITY STUDIOS, INC.,
PARAMOUNT PICTURES CORPORATION,
METRO-GOLDWYN-MAYER STUDIOS INC.,
TRISTAR PICTURES, INC., COLUMBIA
PICTURES INDUSTRIES, INC., TIME WARNER
ENTERTAINMENT CO., L.P., DISNEY
ENTERPRISES, INC., and TWENTIETH
CENTURY FOX FILM CORPORATION,

Plaintiffs,

- against -

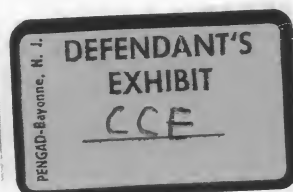
SHAWN C. REIMERDES, ERIC CORLEY a/k/a
"EMMANUEL GOLDSTEIN" and ROMAN
KAZAN,

Defendants

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I, EMMANUEL GOLDSTEIN, declare under penalty of perjury that the foregoing is true
and correct:

1. As stated in my previous Declaration submitted in support of this motion, 2600 is
a quarterly journal with a circulation of approximately 4000 subscribers and 60,000 additional



newsstand readers. Our readers range from teenagers to college professors, corporate executives, universities, and intelligence agencies. By reporting on issues concerning the modern, technical era, including internet issues, *2600*, which now includes the *2600.com* web site, has grown as the public's knowledge of, and fascination with, the internet and all things computer-related has grown. The web site is an on-line supplement to the content published in the print magazine, and does not exist to distribute illegal code.

2. As I've stated previously, *2600.com* posted DeCSS, and currently links to DeCSS mirror sites, because I recognize the importance of such a program to a variety of disciplines, including (i) the ongoing efforts to reverse-engineer an open-source DVD player, (ii) cryptography and the science of encryption, and, most importantly, (iii) the legal fair use of materials contained in movies released on DVD.

3. Neither *2600.com* nor *2600* has, at any time before or after the issuance of the preliminary injunction in this case, in connection with the posting of DeCSS, linking to mirror sites or otherwise, ever advocated, suggested, or otherwise encouraged the use of DeCSS, or the illegal copying or distribution of DVDs. Annexed hereto as Exhibit A are printouts of each of the stories that *2600/2600.com* has published concerning DeCSS. I invite plaintiffs and the Court to read each story carefully to confirm that, indeed, no copying or other "unlawful" activity is advocated.


4. In particular, we have, and continue to state to interested parties that mirroring or linking to DeCSS mirrors is *not* about copying DVDs, but rather about the right to freedom of information and about educating people about technology. For example, *2600.com*'s DeCSS mirror page has, since the issuance of the preliminary injunction, stated in part as follows:

While we have every intention of sticking this out to the end, we have to face the possibility that we could be forced into submission. For that reason, it's especially important that as many of you as possible, all throughout the world, take a stand and mirror these files. Don't do this because you just want to copy DVD's – that's not what this fight is about at all. This is about freedom of information – the right we all still have to LEARN how technology works. . . .

A copy of the *2600.com* mirror page is annexed hereto as Exhibit B.

5. As I stated in my previous declaration in support of this motion, the sites containing DeCSS mirrors to which we currently link are very diverse in nature. In particular, many of these sites provide a variety of legitimate information concerning topics related to this case and DeCSS, and are thus more than just mirrors setting forth the DeCSS code. Annexed hereto as Exhibit C are copies of the first pages of the mirror sites currently listed at *2600.com*.

Dated: June 14, 2000
New York, New York

A handwritten signature in dark ink, consisting of several fluid, overlapping strokes, positioned above a horizontal line.